

# **Exhibit A**

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<p>1 HAN CHUNGUANG</p> <p>2 would accept the correction.</p> <p>3 A I formed a three year college.</p> <p>4 Secondly, Mr. Guo has been teaching me a lot.</p> <p>5 Thirdly, I love to read books. Have educated me a</p> <p>6 lot. Fourthly, society was also a good teacher</p> <p>7 that taught me a lot.</p> <p>8 Q What educational institution gave you</p> <p>9 the degree after the three years of college?</p> <p>10 A It was Chinese school.</p> <p>11 Q What was the name?</p> <p>12 A This question is very specific. I</p> <p>13 don't think I want to answer such a specific</p> <p>14 question.</p> <p>15 Q It is a very common question to be</p> <p>16 asked where you received a degree from, so please</p> <p>17 answer the question.</p> <p>18 A For me this question very specific.</p> <p>19 This is a very private -- no, I don't mean very</p> <p>20 private. I just think this question has nothing</p> <p>21 to do with this case. I don't feel that I should</p> <p>22 answer this question.</p> <p>23 Q Are you concerned about answering the</p> <p>24 question because you did not receive a degree from</p> <p>25 the Chinese school?</p> <p style="text-align: right;">Page 62</p>	<p>1 HAN CHUNGUANG</p> <p>2 Q Was it the athletic school of Lunan?</p> <p>3 A I'm not familiar with the name you</p> <p>4 pronounced. Lunan? I'm not family with it, is</p> <p>5 the way you read it.</p> <p>6 Q Did you receive a degree in athletics</p> <p>7 from your education?</p> <p>8 A Yes. I went to an athletic school.</p> <p>9 Q Is that where you received your</p> <p>10 degree from?</p> <p>11 A In terms of a degree, I always got</p> <p>12 certificate from each level of school. I attended</p> <p>13 an elementary, from junior high to high school,</p> <p>14 and from technical secondary school.</p> <p>15 Q The secondary school was the same</p> <p>16 thing as the technical school; correct?</p> <p>17 A I'm not sure. But in Chinese it is</p> <p>18 called technical secondary school.</p> <p>19 Q The degree you received from the</p> <p>20 technical secondary school was in athletics;</p> <p>21 correct?</p> <p>22 A Yes. Yes. That's why.</p> <p>23 Q Have you received any other degrees</p> <p>24 after high school?</p> <p>25 MR. CHUFF: Objection. Form.</p> <p style="text-align: right;">Page 64</p>
<p>1 HAN CHUNGUANG</p> <p>2 MR. CHUFF: Objection.</p> <p>3 A I did. I went to the school.</p> <p>4 THE INTERPRETER: Interpreter</p> <p>5 would like to correct herself.</p> <p>6 According to the dictionary, the</p> <p>7 three year college actually was more</p> <p>8 like technical secondary school.</p> <p>9 Q Did you receive a degree from a</p> <p>10 technical school?</p> <p>11 A Yes.</p> <p>12 Q What was the name of the technical</p> <p>13 school?</p> <p>14 MR. CHUFF: Objection. Form.</p> <p>15 A It was a long time ago. I don't</p> <p>16 remember.</p> <p>17 Q How old are you?</p> <p>18 A I'm 30 years old.</p> <p>19 Q You can't remember the name of the</p> <p>20 school that gave you a degree?</p> <p>21 MR. CHUFF: Objection.</p> <p>22 Argumentative.</p> <p>23 A I don't remember. I don't usually</p> <p>24 remember small things like this because I'm always</p> <p>25 very business.</p> <p style="text-align: right;">Page 63</p>	<p>1 HAN CHUNGUANG</p> <p>2 A I went to some institutions or</p> <p>3 institution to receive training or trainings.</p> <p>4 Q In what?</p> <p>5 A I would say I learned it by myself.</p> <p>6 For instance, about investment et cetera, et</p> <p>7 cetera.</p> <p>8 Q Did you go to a military or state</p> <p>9 security school in China?</p> <p>10 A No.</p> <p>11 Q What about in Hong Kong?</p> <p>12 A No.</p> <p>13 Q I want to make sure I understand your</p> <p>14 answer to my question about what educational</p> <p>15 experience you had to prepare you to be a director</p> <p>16 of Eastern Profit. You've described your formal</p> <p>17 education.</p> <p>18 What else prepared you to be a</p> <p>19 director of Eastern Profit?</p> <p>20 MR. CHUFF: Objection. Asked</p> <p>21 and answered.</p> <p>22 A Does she mean that only a person who</p> <p>23 receives a formal education to be a director can</p> <p>24 be a director in a company? Is that what she</p> <p>25 means when she asks this question?</p> <p style="text-align: right;">Page 65</p>

17 (Pages 62 to 65)

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<p>1 HAN CHUNGUANG</p> <p>2 Q That is not the question.</p> <p>3 The question is what, besides the</p> <p>4 education you described, prepared you to be a</p> <p>5 director of Eastern Profit?</p> <p>6 A I purchased it and I became the</p> <p>7 director of the company.</p> <p>8 Q So nothing other than the education</p> <p>9 you described prepared you to be a director of</p> <p>10 Eastern Profit?</p> <p>11 MR. CHUFF: Objection. Asked</p> <p>12 and answered. Mischaracterizes the</p> <p>13 testimony.</p> <p>14 A Let me put it this way. My own</p> <p>15 experience, Mr. Guo's teaching, myself learning</p> <p>16 and what I have been learning from my family trust</p> <p>17 or family fund, all this prepared me for it and</p> <p>18 also prepared me for the future. It doesn't mean</p> <p>19 that I only learned things through a formal</p> <p>20 education.</p> <p>21 Q Did you review any written materials</p> <p>22 about Eastern Profit when you became its director?</p> <p>23 MR. CHUFF: Objection to form.</p> <p>24 A I don't remember. In terms of all</p> <p>25 the documents related to the company, they were</p> <p style="text-align: right;">Page 66</p>	<p>1 HAN CHUNGUANG</p> <p>2 Hong Kong.</p> <p>3 Q Regarding Eastern Profit; correct?</p> <p>4 A Yes.</p> <p>5 Q Were you living in Hong Kong at the</p> <p>6 time?</p> <p>7 A Yes. When I purchased Eastern</p> <p>8 Profit, I lived in Hong Kong.</p> <p>9 Q What education did Natasha have that</p> <p>10 allowed her to serve this role?</p> <p>11 MR. CHUFF: Objection. This is</p> <p>12 completely beyond the scope. I let</p> <p>13 this go long enough. He's not --</p> <p>14 MS. DONNELLI: Are you</p> <p>15 testifying for the witness?</p> <p>16 MR. CHUFF: I'm explaining why</p> <p>17 this line of questioning has to stop.</p> <p>18 MS. DONNELLI: Why don't you</p> <p>19 just object to it rather than coach</p> <p>20 him?</p> <p>21 MR. CHUFF: I want to explain my</p> <p>22 basis. I'm not coaching him because</p> <p>23 he's not going to answer it.</p> <p>24 This is not a case where he's</p> <p>25 being sued for managing Eastern</p> <p style="text-align: right;">Page 68</p>
<p>1 HAN CHUNGUANG</p> <p>2 handled by Natasha, whom I trusted very much.</p> <p>3 Q When Natasha was doing this role,</p> <p>4 where was she employed?</p> <p>5 MR. CHUFF: Objection. Asked</p> <p>6 and answered.</p> <p>7 A I don't know whom she was working for</p> <p>8 at the time.</p> <p>9 Q Was she employed by Eastern Profit?</p> <p>10 A She was an agent authorized by me.</p> <p>11 Q An agent authorized for Eastern</p> <p>12 Profit?</p> <p>13 A No. She was the agent authorized by</p> <p>14 me. At the time I was the boss of Eastern Profit,</p> <p>15 I authorized Natasha to handle a lot of stuff in</p> <p>16 Hong Kong for me.</p> <p>17 Q Was she an employee of Eastern</p> <p>18 Profit?</p> <p>19 MR. CHUFF: Objection. Asked</p> <p>20 and answered.</p> <p>21 A An employee? You can say that.</p> <p>22 Q How long was she employed by Eastern</p> <p>23 Profit?</p> <p>24 A I think about two years. I'm only</p> <p>25 talking about she was handling matters for me in</p> <p style="text-align: right;">Page 67</p>	<p>1 HAN CHUNGUANG</p> <p>2 Profit a certain way. This is about</p> <p>3 a contract between an entity and</p> <p>4 another entity.</p> <p>5 MS. DONNELLI: Why don't you</p> <p>6 just say I'm going to instruct him</p> <p>7 not to answer. It will save a lot of</p> <p>8 time, and it won't coach the witness.</p> <p>9 MR. CHUFF: He's not answering.</p> <p>10 Q Is Natasha's name spelled Q-U, first</p> <p>11 name, last name G-U. Last name is Q-U. First</p> <p>12 name G-U-O-J-I-A-O?</p> <p>13 A I don't know this name. I only know</p> <p>14 the person I knew whose name was Natasha.</p> <p>15 Q Have you personally seen the written</p> <p>16 records of Eastern Profit's business dealings?</p> <p>17 MR. CHUFF: Objection. Vague.</p> <p>18 A I think so, yes.</p> <p>19 Q When was that?</p> <p>20 MR. CHUFF: Objection. Vague.</p> <p>21 A I think several years ago.</p> <p>22 Q What was the purpose of your review?</p> <p>23 A When I purchase it, I of course</p> <p>24 looked into the document. I have to know what I</p> <p>25 was purchasing. Once I took over the company, I</p> <p style="text-align: right;">Page 69</p>